

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LAWRENCE A. SCHULER, Individually and On	)	Civil Action No. 1:11-cv-02484-KMW
Behalf of All Others Similarly Situated,	)	
	)	
Plaintiff,	)	<u>CLASS ACTION</u>
	)	
vs.	)	
	)	
NIVS INTELLIMEDIA TECHNOLOGY GROUP,	)	
INC., TIANFU LI, SIMON ZHANG,	)	
ALEXANDER CHEN, KWOK FU WONG,	)	
RUXIANG NIU, MINGHUI ZHANG,	)	
GENGQIANG YANG, CHARLES MO, RODMAN	)	
& RENSHAW LLC, WESTPARK CAPITAL,	)	
INC., and MALONEBAILEY, LLP,	)	
	)	
Defendants.	)	
	)	

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**LEAD PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR  
FINAL APPROVAL OF SETTLEMENT, CLASS CERTIFICATION,  
APPROVAL OF PLAN OF ALLOCATION, AND AWARD OF ATTORNEYS' FEES  
AND EXPENSES AND LEAD PLAINTIFF'S REPRESENTATIVE REIMBURSEMENT**

**TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on March 19, 2015 at 11:00 a.m., in the Courtroom of the Honorable Kimba M. Wood, Judge of the United States District Court, Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, Courtroom 18B, 500 Pearl Street, New York, NY 10007-1312, Lead Plaintiff Allan Lyons (“Lead Plaintiff”) and Plaintiffs Henry C. Beinstein and Michael A. Short (collectively with Lead Plaintiff, “Plaintiffs”) will and hereby respectfully move the Court to enter a judgment and order (1) granting final approval of the Settlement of this litigation; (2) granting class certification for settlement purposes; (3) approving the Plan of Allocation of settlement proceeds and the sufficiency of Notice; and (4) awarding Lead Plaintiff’s Counsel’s attorneys’ fees and expenses and approving Lead Plaintiff’s Representative Reimbursement. This motion is based upon the accompanying Memorandum of Law, the declarations filed in support thereof, the Stipulation of Settlement dated April 22, 2014 and the accompanying exhibits attached therewith, as well as all prior proceedings held in this action, and other such matters and arguments as the Court may consider in the hearing of this motion.

Dated: February 26, 2015

**LAW OFFICES OF CURTIS V. TRINKO, LLP**

By: /s/ Curtis V. Trinko

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*Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the February 26, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered users.

/s/ Curtis V. Trinko  
Curtis V. Trinko